

Remarks:

These remarks are responsive to the final Office Action dated June 7, 2007. Prior to entry of this amendment, claims 1-26 were pending in the application.

In the Office Action, the Examiner objected to claims 2, 16, and 24 as improper dependent form for failing to further limit the subject matter of independent claims 1, 13, and 23, respectively. Claims 2, 16, and 24 have been cancelled without prejudice to facilitate issuance.

Claims 1-4 and 6-26 stand rejected under 35 U.S.C. § 103(a) based on U.S. Patent Publication No. 2003/0090597 A1 Katoh, et al. ("Katoh") in view of U.S. Patent Publication No. 2005/0104908 A1 Brown Elliot ("Brown Elliot"). Claim 5 stands rejected under 35 U.S.C. § 103(a) based on Katoh in view of Brown Elliot and U.S. Patent No. 6,816,141 Fergason ("Fergason"). Applicants respectfully traverse the rejections under 35 U.S.C. § 103(a).

In view of the remarks below, Applicants respectfully request reconsideration of the application and allowance of the pending claims.

Rejections under 35 USC § 103

Rejections Based on Katoh In view of Brown Elliot under 35 U.S.C. § 103(a).

As noted above, claims 1-4 and 6-26 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Katoh in view of Brown Elliot. Applicants have cancelled claims 2, 16, and 24 without prejudice. Applicants respectfully submit that claims 1, 3, 4, 6-15, 17-23, 25, and 26 are allowable over the cited art and request reconsideration of this rejection.

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To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim features (MPEP § 2142). In the present case, the references (individually, or in combination) fail to teach all of the claim features, nor do they suggest the proposed combination.

Both Katoh and Brown Elliot fail to teach or suggest a system and method for displaying an image as recited in the present claims. As previously presented, Katoh does not disclose or suggest a portion of the image represented by an image element of the second sub-frame and also by at least two image elements of the first sub-frame. Examiner acknowledges such and thus relies upon Brown Elliot to teach such an arrangement.

Brown Elliot includes a method for projecting for each pixel in a multipixel image a plurality of beams of different colors towards an imaging surface, with the color imaging planes for each pixel overlaid upon each other with an offset of about one-half pixel. The image, therefore, is shifted optically to separate the red, blue, and green color planes by about one-half pixel. Examiner refers to the separate color planes as sub-frames spatially offset from one another. However, the color planes represent the same portion of the image. In contrast, applicants' sub-frames represent different portions of the image with a portion of each being in common. In Applicants' method,

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the portion of the image in common is represented by an image element of the second sub-frame and also by at least two image elements of the first sub-frame. In contrast, the sub-frames in Brown Elliot represent the same portion of the image, just offset from another and representing different chromatic information. Therefore, in Brown Elliot the portion of the image in common is represented in an equal 1:1 image element ratio between the sub-frames.

Brown Elliot's method can be visually depicted compared to Applicants' method as shown in the below Figs. A-C. Fig. A shows a received image with a portion of the image noted in gray. Fig. B shows a first sub-frame (e.g., a Green sub-frame in Brown Elliot's method) of an area of the image shown in Fig. A with the portion of the image noted in gray represented by two image elements of the first sub-frame. Fig. C reflects the differences between Brown Elliot's method and Applicant's method. In Brown-Elliot's Fig. C, a second sub-frame (e.g. a Red sub-frame) has data representing the same area of the image corresponding to the first subframe, just displayed offset by one-half pixel (i.e., spatially shifted). The portion of the image noted in gray in Fig. A is therefore represented by two image elements of the second sub-frame in Brown-Elliot, just as it was represented by two image elements of the first subframe. In contrast, in Applicants' Fig. C, a second sub-frame has data representing a different area of the image (having a portion of the area in common with the first sub-frame), and therefore the portion of the image noted in gray in Fig. A is represented by one image element of the second sub-frame. Applicants' second sub-frame is a spatially different part of the

image in contrast to Brown-Elliot's second sub-frame which is the same part of the image as in the first-subframe, just spatially shifted.

FIG. A Portion in gray is a portion of an image:

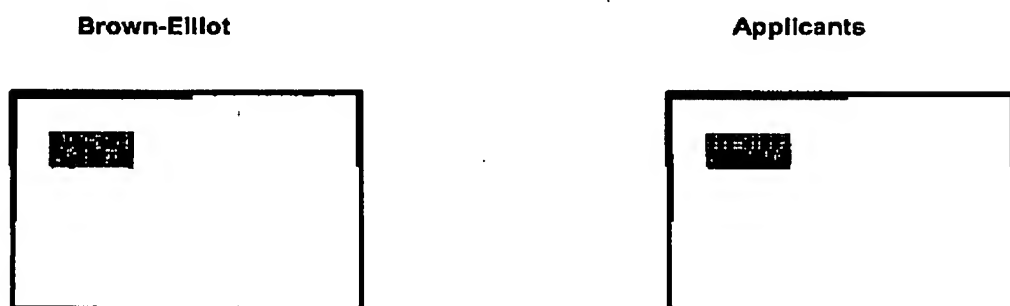


FIG. B Portion of image in Fig. A represented by two image elements of the first subframe:

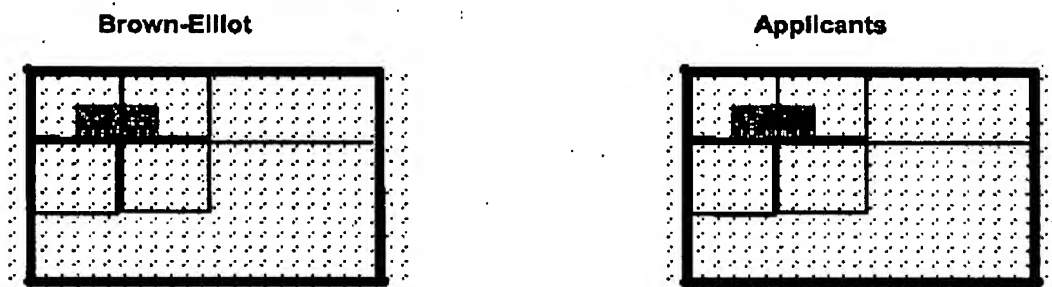
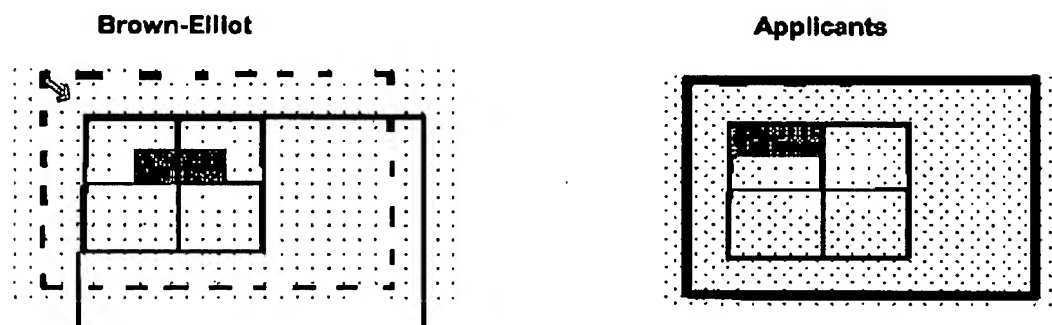


FIG. C Portion of image in Fig. A represented by the second subframe:



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The first and second sub-frames of Brown Elliot contain information about the same area of the received image, and are just displayed offset from one another. In contrast, Applicants' sub-frames contain information about different areas of the received image, with only a portion of the areas in common. Accordingly, Brown Elliot does not disclose or suggest a portion of the image represented by an image element of the second sub-frame and also by at least two image elements of the first sub-frame.

Therefore, the combination of Katoh and Brown Elliot does not suggest or teach the claim features of independent claims 1, 13, 23, and 26, nor any claims depending therefrom (including claims 3, 4, 6-12, 14-15, 17-22, and 25).

In absence of such disclosures, the cited references do not satisfy the most basic requirement for establishing a *prima facie* case of obviousness. Accordingly, claims 1, 3, 4, 6-15, 17-23, 25, and 26, are allowable over the combination of those references.

Rejections under 35 USC § 103

Rejections Based on Katoh in view of Brown Elliot and Fergason under 35

U.S.C. § 103(a).

As noted, claim 5 stands rejected under 35 U.S.C. § 103(a) as unpatentable over Katoh in view of Brown Elliot and Fergason. Applicants respectfully submit claim 5 is allowable over the cited art, and request reconsideration of this rejection.

Applicants again note that to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary

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skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim features (MPEP § 2142). In the present case, the references fail to teach or suggest all the claim features, nor do they suggest the claimed combination.

Katoh, Brown Elliot, and Ferguson fail to teach a system and method for displaying an image as recited in the present claims. As previously presented, both Katoh and Ferguson do not disclose or suggest a portion of the image represented by an image element of the second sub-frame and also by at least two image elements of the first sub-frame. Examiner acknowledges such and relies upon Brown Elliot to meet this missing element.

As previously presented, Brown Elliot fails to teach or suggest a portion of the image represented by an image element of the second sub-frame and also by at least two image elements of the first sub-frame. In absence of such disclosure, the cited reference does not satisfy the most basic requirement for establishing a prima facie case of obviousness. Accordingly, claim 5 is allowable over the combination of those references.

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Conclusion

Applicants believe that this application is now in condition for allowance, in view of the above amendments and remarks. Accordingly, Applicants respectfully request that the Examiner Issue a Notice of Allowability covering the pending claims. If the Examiner has any questions, or if a telephone interview would in any way advance prosecution of the application, please contact the undersigned attorney of record.

Respectfully submitted,

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to Examiner H. Tran, Group Art Unit 2629, Assistant Commissioner for Patents, at facsimile number (571) 273-8300 on August 7, 2007.



Christie A. Doolittle

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